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ABSTRACT

A panel of 16 school administrators from 8 states developed this draft application for discounted school telecommunications services as part of efforts to advise the Federal Communications Commission on rural implications of the implementation of the Telecommunications Act of 1996. The application is split into a seven-page cover application to be completed by the school district and a one-page application to be completed for each school. Section 1 of the cover application requests identification of schools applying for the discount and information concerning the free-lunch program, which is used to determine the amount of the discount. Section 2 is for schools applying as a consortium, section 3 requests information regarding the required technology plan, and section 4 is for districts that already have a telecommunications contract in place. Section 5 helps the district determine its discount percentage, section 6 is authorization to post a request for bids on the World Wide Web, and section 7 is for signature and certifications of applicant districts. The one-page individual school application requests identification, the telecommunications service being requested, and an optional calculation of free-lunch participation. Nine issues that may require additional input or clarification are discussed in an addendum. These are: information dissemination, discount application procedures, fund size, school- versus district-level discounts, free versus free and reduced-price lunch percentages, issues surrounding the required technology plan, compliance audits, private school application adaptation, and application format. (TD)

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DRAFT APPLICATION FOR DISCOUNTED SCHOOL TELECOMMUNICATION SERVICES

RUPRI RURAL TELECOMMUNICATIONS TASK FORCE

April 30, 1997

P97-6

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The Rural Policy Research Institute provides objective analyses and facilitates dialogue concerning policy impacts on rural people and rural places.

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April 30, 1997

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Ex-Parte Presentation in Docket No. 96-45, Federal-State Joint Board on Universal Service

Dear Mr. Caton:

In an effort to provide the FCC with relevant data which can be used to more knowledgeably implement the telecommunications discount program for schools and libraries, the Rural Policy Research Institute (RUPRI) has assisted in putting together an enclosed draft Application for School Telecommunications Discount. The Application was designed by a School Administrator Panel consisting of two school administrators from each of the eight states involved in the original RUPRI Telecommunications Study. Nominations to the panel were secured through each of the Regional Education Laboratories in the country, who paved the way for the first RUPRI contact. An explicit effort was made to include both large and small school administrators. Due to the time constraints involved, the Panel met virtually, providing feedback by means of conference calls, e-mail, fax, and phone. The enclosed draft application is the result of three weeks' intensive effort to think through the issues and design a draft application which both meets the anticipated regulatory requirements and is minimally burdensome to schools. An addendum to the application points out those issues which were raised by the Panel and which, in their view, may require additional input or clarification.

The draft Application is not intended as a finished product, but rather as an accelerated starting point from which a Program Administrator may now continue the process.

Sincerely,

Charles W. Fluharty

Charles W. Fluharty
Director

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cc: Jamie Rubin
Mark Nadel

PREFACE

The Rural Policy Research Institute (RUPRI) has assembled a distinguished group of nationally recognized rural telecommunications policy analysts and practitioners, to serve as an ongoing research and decision support resource for Congressional and state legislators, as well as federal and state regulators, to assist these decision makers in assessing the rural implications of their implementation and evaluative decisions regarding the Telecommunications Act of 1996.

This Rural Telecommunications Expert Panel was chosen to reflect geographic, disciplinary, and organizational diversity. It is anticipated that membership on this panel will expand, as the scope of this work broadens to address the expanding challenges within this policy decision process. Current Panel Members are listed below:

RUPRI Rural Telecommunications Task Force

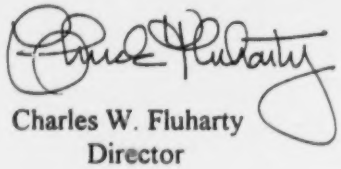
John Allen, University of Nebraska - Lincoln
Don Dillman, Washington State University
Chuck Fluharty, Rural Policy Research Institute
Vicki Hobbs, Missouri Interactive Telecommunications Education Network
Craig Howley, ERIC Clearinghouse on Rural Education and Small Schools, Appalachia Educational Laboratory, Inc.
Paul Stapleton, Superintendent, Charlotte, Virginia County Schools

The following draft application was developed in collaboration with a national advisory board of school administrators, in an effort to provide the FCC with relevant data which could be used to more knowledgably implement the telecommunications discount program for schools and libraries. This draft Application for School Telecommunications Discount was primarily designed by this School Administrator Advisory Panel, composed of two school administrators from each of the eight states involved in earlier RUPRI telecommunications studies submitted to the FCC. Nominations for this advisory panel were secured through each of the Regional Educational Laboratories, and an explicit effort was made to include both large and small school administrators.

Due to the time constraints involved, this advisory panel met virtually, providing feedback by means of conference calls, E-mail and fax. This enclosed draft application is the result of a three week intensive effort to assess the issues involved, and design a draft application which both meets the anticipated regulatory requirements, and is minimally burdensome to schools. In the addendum to this application, specific issues which the advisory panel believed may require additional input or clarification are more fully explicated.

This draft application is not intended as a finished product. Rather, it is hoped that this might provide an accelerated starting point to assist the Program Administrator charged with

developing this application and process. The RUPRI Rural Telecommunications Task Force appreciates the assistance of the Regional Education Laboratories in developing the advisory panel of school administrators, and we particularly appreciate the time commitment and expertise contributed by the administrators selected for this panel. RUPRI Task Force leadership for this project, and drafting of the final document was provided by Vicki Hobbs.



Charles W. Fluharty
Director

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Superintendent
Knox County R-I Schools
Edina, Missouri

Alan S. Brown
Superintendent
Waukegan Public Schools
Waukegan, Illinois

DISTRICT COVER APPLICATION
for Discounted School Telecommunications Services

Section 1: IDENTIFICATION--To be completed by all applicant districts

1 Date of Application: _____

2 Applicant District : _____ NCES National Sch Code: _____

3 State: _____

4 List **all** district schools below or on an attached printout, regardless of whether a discount is being applied for each. Indicate if an application is attached for each school. The Free Lunch % used should be the official Fall Head Count as reported to the State Education Agency for the prior school year. The Discount % Column is optional and can be completed after calculations in Section 6.) To determine unweighted averages in Items 5 and 6, add all percentages and divide by the number of schools.

Elementary Schools	NCES Sch Code	Free Lunch %	√ if Applic is Attached	Discount %	Middle/Jr. High High Schools	NCES Sch Code	Free Lunch %	√ if Applic is Attached	Discount %

5 Average Elem School %: _____ 6 Average Mid/Jr./High Sch %: _____

7 In how many district schools will the discounted telecommunications service be implemented? _____

8 Has any school (for which a discount is requested) received previous discounts under the Telecommunications Act of 1996?
____ Yes ____ No

9 If so, what was the date of each application submitted? (If more than one application was involved, attach a separate page listing all schools and the date of application for each) _____

10 The average Free Lunch % for ALL elementary schools in the district (regardless of whether discounted services are requested) is:
_____ %

Section 2: TELECOMMUNICATIONS CONSORTIUMS--To be completed only by districts applying as part of a multi-district or community consortium

NOTE: Schools may wish to apply as part of a consortium in order to insure that discounts are considered simultaneously.

11 Is the applicant district applying as part of a consortium? __ Yes __ No

12 List all other school districts which are part of the consortium for which a discount is being requested. (A separate sheet may be attached if necessary)

13 List all other non-school district members of your telecommunications consortium. (List all members whether or not they will be eligible for a discount--a separate sheet may be attached if necessary)

Section 3: EXISTENCE OF A TECHNOLOGY PLAN--To be completed by all applicant districts

NOTE: Each school and/or district is required to have a current technology plan on file in the district office which covers the planned implementation and use of the discounted telecommunications service being requested.

14 Indicate below whether the following requirements have been met.

Yes	No	
___	___	a) a District and/or School Technology Plan exists
___	___	b) the requested telecommunications service is covered in the District and/or School Technology Plan
___	___	c) steps to implement the requested telecommunications service are included in the Plan
___	___	d) plans for training of faculty and staff in utilizing the proposed telecommunication service are included in the Plan

e) the Plan identifies funds which are available to cover related non-discounted expenditures, including

Yes	No	Not Applicable	
___	___	___	computer hardware and peripherals (e.g., modems, printers, CD-ROM drives, etc
___	___	___	classroom video equipment (e.g., cameras, speakers, monitors, etc
___	___	___	computer software
___	___	___	other? _____

15 Date of completion of District Technology Plan: _____ 16 Date of Board of Education approval (if required):_____

Section 4: TELECOMMUNICATIONS CONTRACT ALREADY IN PLACE--To be completed only by applicant districts who have a telecommunications contract in place but for which a discount is now being requested

17 Does the applicant district have a service contract already in place for any telecommunications service for which a discount is now being requested:
___Yes ___ No

18 By which telecommunications company or service provider is the service now being provided?
NAME: _____
ADDRESS: _____ STATE: _____ ZIP: _____

19 Check the requested discounted service for which a current contract exists. (If individual schools are involved in different service contracts, please list the SERVICE and the COMPANY NAME and ADDRESS for each school on an attached page.)

CHECK ONLY ONE IN THIS BOX

Switched Services	Dedicated Access Services	Packet Data Services	Wireless Services	Internet-Related Costs
__ Voice-line service	__ 56 Kbps	__ Frame Relay (T-1)	__ Cellular	__ Internet Service Provider Fees
__ Switched 56K	__ Fractional T-1	__ Frame Relay (DS-3)	__ Packet Radio	__ Networking Hardware (e.g., hubs, routers, servers, etc.)
__ ISDN - BRI	__ T-1 (1.544 Mbps)	__ ATM (OC-3c)(12)(48)		
__ ISDN - PRI	__ x DSL			
	__ Analog Fiber			
	__ DS-3 (45 Mbps)			
	__ OC-12(24)(48)			

Section 5: DETERMINATION OF DISCOUNT PERCENTAGE--THIS SECTION IS OPTIONAL -- Applicant districts may complete this section if they wish to calculate their level of discount in advance of official notification.

20 In order to determine the discount percentage for which you are eligible, you will also need to determine the "Cost Area" in which you are located. The local exchange carrier(s) providing primary local telephone service to applicant schools should be listed below. The cost of service designation (Low Cost, Mid-Cost, or High Cost) and LEC Code Number for each carrier can be identified by:

a) accessing the FCC World Wide Web page on the Internet at: http://www._____
b) calling your state Public Utilities Commission or accessing their WWW page

Current Local Exchange Carrier(s)	LEC Code No.	Cost of Service Designation (circle one)		
_____	_____	Low	Mid	High
_____	_____	Low	Mid	High

21 Guidelines for determining your school discounts are as follows:

a) If you are applying for **elementary schools only**

- If applying for **some but not all** elementary schools, your discount % will be based on the Free Lunch % and Cost of Service of each individual elementary school. Complete the list below. (Use an additional page as necessary)

Elem School 1: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 2: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 3: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 4: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 5: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 6: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 7: _____ Free Lunch %: _____ Cost of Service: L M H
Elem School 8: _____ Free Lunch %: _____ Cost of Service: L M H

- If applying for **all** elementary schools in the district, you are entitled to a single discount rate based on the average elementary percentage free lunch eligibility. Insert the discount % from Section 1 Item 5 here: _____%

b) If you are applying for **all schools in the district**, you are entitled to a single discount rate which is the higher of: (1) the average elementary Free Lunch % from Section 1 Item 5; or (2) the average middle/junior/high school Free Lunch % from Section 1 Item 6. Insert the higher % here: _____%

c) If you are applying for **some or all** middle, junior high, or high schools **BUT NOT** all schools district-wide, the discount % for each school will be the higher of: (1) the free lunch eligibility percentage for each individual school (Option A on the Individual School Application); or (2) the average free lunch eligibility percentage for all feeder elementaries to that school (Option B on the Individual School Application) . Complete the list below. (Use an additional page as necessary)

M/J/H School 1: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 2: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 3: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 4: _____ Free Lunch %: _____ Cost of Service: L M H

M/J/H School 5: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 6: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 7: _____ Free Lunch %: _____ Cost of Service: L M H
M/J/H School 8: _____ Free Lunch %: _____ Cost of Service: L M H

22 Using the discount matrix below, you can determine the percentage discount to which you will be entitled, upon approval of this application. For each applicant school, locate the appropriate free lunch elibiligibility rate and cost of service designation in the table below. Insert the percentage for each school (for which an application is attached) in the Column labeled "Discount %" in Section 1.

FREE LUNCH PERCENTAGE	COST OF SERVICE		
	Low Cost	Mid-Cost	High Cost
< 1%	20%	20%	25%
1-19 %	40%	45%	50%
20-34 %	50%	55%	60%
35-49 %	60%	65%	70%
50-74 %	80%	80%	80%
75-100 %	90%	90%	90%

Section 6: AUTHORIZATION TO POST SERVICE REQUEST ON WWW--to be completed by all applicants

23 The fiscal officer for the District will be responsible for writing bid specifications and for submitting them to ___(the Fund Administrator)___ upon notification of approval of this application.

24 By signing this application, I hereby authorize the Federal Communications Commission or their program administrator to post notice of this request for discounted telecommunications service on the _____ WWW page, notifying all prospective bidders as to the service requested and how to secure a copy of the district's bid specifications. WWW posting will occur within 30 days of receipt of this application.

25 The Board of Education will select the lowest responsible bidder for requested telecommunications services in accordance with accepted district bidding policy no earlier than 60 days from receipt of this application by the program administrator. The District Superintendent or Other Person Authorized by the Board of Education will notify the FCC or their Program Administrator and the selected carrier or service provider upon bid acceptance. (A Form will be provided along with application approval.)

Section 7: SIGNATURE--To be completed by all applicant districts

26 Name of District Superintendent or Other Person Designated by the Board of Education: _____

27 Mailing Address of Signee: _____ STATE: _____ ZIP: _____

28 Phone number of Signee: (_____) - _____ 28 FAX #: (_____) - _____

29 Name, address, and phone number of person to whom requests for bid specifications should be made (if different from above):
Name:
Address:
Phone Number:

30 Date of Board Authorization for this Application: _____

31 By signing this application, the District Superintendent or Other Person Designated by the Board of Education duly certifies that **all** schools listed in this application:

a) meet the statutory eligibility criteria, that is, they:
   (1) meet the statutory definition of an elementary or secondary school found in the Elementary and Secondary Education Act of 1965;
   (2) do not operate as a for-profit business; and
   (3) do not have an endowment exceeding $50 million.
(b) will use the discounted telecommunications services solely for educational purposes
(c) will not sell, resell, or transfer any discounted telecommunications services or network capacity in consideration for money or any other thing of value
(d) has identified within this application all consortium co-purchasers, whether schools or other entities, and whether eligible for discounted services or not
(e) has reported the accurate percent of students certified as eligible for the National School Free Lunch Program in accordance with the free lunch application and/or direct certification procedures established by the State Education Agency
(f) assures that each school (within the district) receives the full benefit of the discount to which it is entitled
(g) has on file in the district office a current technology plan for the district and/or for each school involved which outlines the use of the proposed telecommunication service

32 The District Superintendent or Other Person Designated by the Board of Education further certifies that:

(a) The Board of Education has been made aware and has identified resources to cover all necessary expenditures required over and above the discounted funds approved
(b) the telecommunications services for which a discount is requested will substantially contribute toward the attainment of local educational goals

(c) no bid will be accepted earlier than 60 days from receipt of this application by the program administrator
(d) any bid subsequently accepted will be done in accordance with standard district practice and will not differ from the bidding policies enacted by the district for other major purchases
(e) any bid subsequently accepted will be the lowest responsible bid that conforms to the requirements of the bid specification

33 The District Superintendent or Other Person Designated by the Board of Education further understands that:
(a) all procurement and accounting records involving discounted telecommunications services should be kept for a five-year period
(b) such records are subject to a compliance audit at the discretion of the fund administrator
(c) additional reporting information may be required from time to time by the fund administrator
(d) all technology plans are subject to audit by the program administrator or other designated body

34 _____
Signature of District Superintendent
or Other Person Designated by the
Board of Education

35 _____
Title

INDIVIDUAL SCHOOL APPLICATION
for Discounted Telecommunications Services

SECTION 1: IDENTIFICATION -- To be completed by each individual school

1 Name of School: _____ 2 Name of District _____ 3 Name of State _____

SECTION 2: REQUESTED SERVICE AND APPLICATION(S) FOR WHICH TELECOMMUNICATIONS SERVICE WILL BE USED--To be completed by each individual school

4 Specific telecommunications service for which a discount is being requested:

CHECK ONLY ONE IN THIS BOX

Switched Services	Dedicated Access Services	Packet Data Services	Wireless Services	Internet-Related Costs
__ Voice-line service	__ 56 Kbps	__ Frame Relay (T-1)	__ Cellular	__ Internet Service Provider Fees
__ Switched 56K	__ Fractional T-1	__ Frame Relay (DS-3)	__ Packet Radio	__ Networking Hardware (e.g., hubs, routers, servers, etc.)
__ ISDN - BRI	__ T-1 (1.544 Mbps)	__ ATM (OC-3c)(12)(48)		
__ ISDN - PRI	__ x DSL			
	__ Analog Fiber			
	__ DS-3 (45 Mbps)			
	__ OC-12(24)(48)			

5 Check all applications for which the above telecommunications service will be utilized:

__ Internet access
__ LAN /data transmission
__ WAN/data transmission
__ Two-way interactive TV
__ Desktop videoconferencing
__ Voice communication
__ Other _____

Section 3: OPTION TO CALCULATE ELEMENTARY PERCENTAGES ONLY -- To be completed by applicant middle, junior high, or high schools

6 Since in most districts elementary free-lunch eligibility rates are considered to be more accurate than for older students, middle, junior high, and high schools may opt to use the average Free Lunch % for either: (A) all elementary schools in the district; OR (B) for only those elementary schools which feed into the applicant school.

Option A: The average % Free Lunch for all district elementary schools is: _____ %
Option B: The average % Free Lunch for all FEEDER elementary schools is _____ % (Attach list of all feeder elementary schools with % Free Lunch for each.

Notes on the Procedures Surrounding the *Application for Discounted School Telecommunications Services*

In the context of designing the accompanying *Application* , the RUPRI School Administrator Panel discussed several related issues. The following enumerates those issues and, where a decision was not reached, attempts to explain the differing points of view expressed by Panel members.

1 Information Dissemination

- Several Panelists were concerned that there is the danger that a small number of applications during the initial year of the program may send the wrong signal to Congress and others. What may be a problem with rapidly informing schools across the country about how to access the discounts AND getting them to immediately act on that information, may be interpreted as a lack of interest or need.
- Related ideas expressed by the Panel included getting an information packet into schools which could include sample bid specifications for various telecommunications technologies, a glossary of telecommunications technology terms, a sample technology plan or rubric for developing an acceptable technology plan, etc.
- Some support structure will be essential in helping less capable districts understand how bid specifications need to be developed. At a rudimentary level, sample bid specs included in an initial information packet may help. These specs could be technology neutral in the sense that they would specify only the end result required--for instance, internet connection to 30 Macintosh Performa 5200's across 30 classrooms in two adjacent buildings with sufficient bandwidth to allow for 20 simultaneous WWW users. However, the Panel believed that those schools in a position to request a specific bandwidth for a specific purpose should be allowed the perogative to do so, therefore, schools need to retain the ability to submit bid specifications of their own design to the Program Administrator for mounting on the nationwide WWW page. There is a trade-off in terms of when the bid specs would be submitted. If they accompanied the *Application for Discount* , time would be saved in initiating the service, however, that would undoubtedly delay the submission of the *Application* during the first year. It was concluded that a preferrable method would be as follows in the Application Procedures.
- Information to be included on the Fund Administrator Web Page:
  a) NCES national school code number for each school in the US
  b) Cost designation (High, Mid-, Low) for every local exchange carrier by state --so that schools can immediately find out their cost designation, if they choose to do so, in order to determine the %

discount they would receive

(c) The Local Exchange Carrier Code Number for each LEC by state--so that no confusion results over carriers with similar names

(d) Bid specifications for each applicant district as submitted

- Information to be included on each State Education Agency WWW page:
  a) NCES national school code number for each school in the state
  b) Hot link to State PUC Web page which would include:
     (1) Cost designation (High, Mid-, Low) for every local exchange carrier in the state
     (2) The Local Exchange Carrier Code Number for each LEC in the state

2 Discount Application Procedures

The following is believed to be a workable procedure for submission of discount applications by schools.

a) the district would submit to the Program Administrator a cover application and accompanying one-page school application for each school for which a discount was being applied

b) the Program Administrator would review each application and upon its approval would post on its WWW page the name of the district, number of school involved, state in which located, service requested, for what purposes the service will be utilized, and contact information through which bid specifications could be requested

c) the district would receive notification of application approval and WWW posting, along with the discount percentage awarded

d) interested telecommunications carriers or service providers would contact each district directly for a copy of their bid specifications (Contact information would be included on the WWW page.)

e) schools not having received any bids for requested services as a result of the WWW posting or through active bid solicitation within 60 days of the initial WWW posting would have the opportunity to apply for the services of a carrier of last resort (perhaps through their state PUC)

f) the accepted bidder would be required to submit a form to the Program Administrator detailing the services to be provided, the accepted bid price, and PUC verification of "lowest corresponding price to similiarly situated non-residential customers"

g) upon completion of installation, the carrier or service provider would initiate a *Completion of Installation Form* , which would require the signature of the district superintendent or other person designated by the Board of Education

h) upon receipt of the *Completion of Installation Form* , the Program Administrator would put into process the reimbursement mechanism to

the carrier or service provider for the differential between the bid price and discount price.

3 Fund Size

- Some Panelists were concerned that, with the push to wire schools for the Internet, the need for distance learning and other telecommunications technologies would be short-changed
- Concern was also expressed regarding the advantage provided to schools who, because of a progressive State Department of Education or Public Utilities Commission or because of knowledgeable school personnel, were able to immediately submit an application. Those schools without advocate agencies or knowledgeable personnel would be at a distinct disadvantage.
- Providing that the $2.25B would cover initial school requests, the fund would need to increase in subsequent years to allow for ongoing discounted services, while enabling new discounts to schools who had not applied before and for discounts to schools for new services.
- The idea of restricting school applications to one service per year met with differing points of view. Some Panel members felt this was a rational way to make sure that schools sought out that technology which was most immediately needed while enabling a larger number of schools to participate in the process. Other Panel members felt that it would be more realistic to allow schools to apply for all technologies simultaneously in order to show what the real demand is.

4 School vs. District-level Discounts

- The issue of whether districts should receive differential discounts based on individual school situations was debated. Several Panelists felt that, since the district is the fiscal entity through which revenue is generated and expenditures made, the idea of differential discounts to individual schools was meaningless. In large districts, it would be much more difficult and require more record keeping to have a differential discount rate apply to each individual school. The administrators largely felt that it would make no difference in terms of implementation or aggregate cost whether differential discounts or an average discount was used.

5 Use of Free vs. Free and Reduced Lunch Percentages

- While some administrators felt that both free and reduced lunch percentages were necessary in order to give an equitable discount to all schools, others felt that use of free lunch percentages only would simplify the application process and auditing procedures required.
- The advantages cited with respect to use of Free Lunch %'s only include:
  (a) allowance for indirect auditing of school applications through

comparison with the free lunch data submitted by State Departments of Education to the National Center for Educational Statistics(NCES) --reduced percentages are not included in the NCES database. NOTE: This would prevent the need for direct auditing of school district records.

(b) allowance for use of 'direct certification' procedures (e.g., number of AFDC and food stamp recipients among enrolled student body) in lieu of Free Lunch Applications. NOTE: 'Directly certified' students are equivalent to 'free-lunch eligible' students; there is no reduced-lunch counterpart to 'direct certification'.

(c) allowing private and non-participating public schools to use percentage of enrolled students receiving AFDC or food stamps without the requirement to identify reduced-lunch eligible students through the Lunch Program Application process. NOTE: Several State Departments of Education, in conjunction with the State Department of Social Service, already provide lists of AFDC and food stamp recipients by zip code to school districts for purposes of easily determining student free-lunch eligibility by what is called 'direct certification' methods. This service could be extended to qualified private schools as well.

- The need for using weighted or unweighted averages for free or free/reduced lunch was discussed. Some Panel members felt that weighting averages based on enrollment would be more accurate and should therefore be used; others felt that weighting would not dramatically alter the resulting percentage and would not be worth the added effort.
- In terms of time and effort required by the application, large districts especially will benefit from the allowance to calculate discount percentages based on the average free lunch % of all elementary schools in the district rather than for each school individually. In such case, Items 21 a, b, and c could be eliminated from the application. School administrators on the Panel saw no inherent problems in using the average elementary free lunch %. The compromise was made to use averge elementary free lunch % in the case where a discount was being applied for by all schools in the district and to use individual school free lunch %'s in the case of selective school telecommunications deployment.
- It was believed that use of prior year free lunch statistics would cause fewer problems that attempting to use current year statistics and that the percentage used should be identical to the official Fall head count (for the prior year) as reported to the State Education Agency. This should eliminate variances in the type of statistics reported. It would also allow for non-identical reporting deadlines among states.

6 Issues Surrounding the Required Technology Plan

- Some administrators worried that the requirements for a technology plan may impede the very districts who most need access to telecommunications. A possible solution discussed was the inclusion of a sample format for a technology plan (which would meet the requirements of the FCC) which could be distributed in an informational packet to all schools.
- Others panel members worried that, by expliciting including elements expected of the Technology Plan, the inference to Superintendents was that they had to check "Yes" on each, whether or not it was actually in existence. Some worried that the "threat" of an audit may deter schools from applying at all. Some wondered whether it was logical to require a technology plan when there was no viable means of actually auditing schools for compliance, unless that became part of regular program audits conducted by State Departments of Education.

7 Compliance Audits

- The issue of "audits" was discussed by the Panel. Clearly, several unanswered questions arose: (1) Will audits be required? (2) Who will conduct any audits? (3) Will technology plans be subject to audit? (4) How will verification occur with respect to free/reduced lunch percentages used in the application?

8 Private School Application Adaptation

- An idea which was discussed with respect to private schools was the option to use either:
  (a) a free/reduced application process whether or not they participated in the free lunch program; or
  (b) allowing private and non-participating public schools to use percentage of enrolled students receiving AFDC or food stamps; or
  (c) a comparable census statistic for the public school district or city in which they were located, such as Average Household Income. This, however, would require a means of converting Average Household Income into six categories equivalent to the breakdown on free/reduced lunch.
- The application has not been tested from a private school perspective; a separate application for both private schools and for libraries may simplify the process for all, by not incorporating all contingencies in a single application.

9 Application Format

- Panelists agreed that the "district" should be the official applicant, since financial responsibility lies at the district level
- Panelists preferred splitting the application into a "cover application" to be completed by the district, along with a one-page application to be completed by/for each school
- Panelists believed that giving districts the option--but not requiring them --to calculate their discount percentage prior to being officially notified by the FCC/ Program Administrator was appropriate
- An item-by-instruction sheet needs to accompany the application
- Discussion occurred around whether there should be a limitation on the size of the consortium allowed to apply... For instance, if a state wished to apply for discounts on voice lines to all classrooms or a 56k line to each school for Internet access, would that be permissable?